



June 30, 1997



Cal/EPA

Department of
Toxic Substances
Control

Pete Wilson
Governor

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Mr. Robert W. Wood
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Secretary for
Environmental
Protection

SITES 7 AND 167, DRAFT SUMMARY OF REMOVAL ACTION,
PHILLIPS LABORATORY, OPERABLE UNIT NUMBER 4, MARCH 1997

Dear Mr. Wood:

The California Department of Toxic Substances Control (DTSC) and the California Regional Water Quality Control Board (RWQCB), Lahontan Region (collectively, the State) have reviewed the March 1997 Draft Summary of Removal Action for Sites 7 and 167 in Operable Unit Number 4 (Report). The Non-Time Critical Removal Action (RA) for these sites was completed on December 18, 1996.

A total of 8482 cubic yards of beryllium contaminated soil were excavated and deposited on-site under the DTSC Corrective Action Management Unit (CAMU) regulations and in accordance with the Applicable or Relevant and Appropriate Requirements contained in Title 23, California Code of Regulations, Chapter 15. The excavated soils were consolidated, composite capped, and revegetated. The CAMU is fenced and posted and its location permanently recorded in the Base Comprehensive Plan for Edwards Air Force Base.

Confirmatory soil sampling of the excavated sites indicates that the risk assessment inhalation pathway concern has been reduced below the United States Environmental Protection Agency Industrial Preliminary Remediation Goal of 1.1 mg/kg for beryllium. Additionally, the RWQCB has determined that there is no beryllium threat to water quality beneath the CAMU due to the composition of the subsurface lithology and the approximate 300 foot depth between ground surface and the ground water table.



Mr. Robert W. Wood
June 30, 1997
Page Two

Based upon the above information, the State approves the Report and considers the RA to be complete.

Should you have any questions, please contact Mr. John O'Kane, Project Manager, at (916) 255-3715, or Ms. Cindi Mitton, of the RWQCB, at (760) 241-7413.

Sincerely,



Anthony J. Landis, P.E.
Chief
Northern California Operations
Office of Military Facilities

cc: Mr. Richard T. Russell, P.E.
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